

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CHEVRON CORPORATION, :
: .
: .
Plaintiff, : .
: .
v. : 11-CV-0691 (LAK)
: .
: .
STEVEN DONZIGER, et al., : .
: .
Defendants. : .
: .
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NOTICE OF LODGING OF WITNESS STATEMENTS

Pursuant to Your Honor's Individual Practices and order of October 7, 2013 (Dkt. 1501), Chevron hereby notifies the Court that on October 9, 2013, it delivered to the Court two paper copies of each witness statement, as well as a CD containing digital copies of the same, for the witnesses that Chevron anticipates calling during the first week of trial, time permitting. Chevron also has provided copies to Defendants of these witness statements. The order in which Chevron expects to call these witnesses is identified below, although Chevron reserves the right to adjust this order as needed to accommodate any issues regarding availability. Chevron anticipates that witnesses with asterisks may be called out of order to fill in the remainder of a court day. While this is Chevron's current best approximation of witness order, Chevron may have to adjust the order of certain witnesses to accommodate availability. For example, Mr. Rayner will be called on Friday, October 18, even if out of order. Additionally, Mr. Callejas will be called no earlier than Friday, October 18. Chevron will advise Defendants and the Court as far in advance as feasible of those adjustments. Chevron also reserves the right to elicit additional direct testimony from these witnesses as needed to respond to issues that may arise in the course of the

trial or to authenticate or otherwise lay a foundation for the admissibility of any document or other evidence offered by Chevron, to the extent authenticity or foundation is disputed.

1. Reis Veiga, Ricardo
2. Bogart, Christopher
3. Russell, David
4. McMillen, Sara
5. Arsuaga, Cristina (authentication/summary witness)*
6. McGowan, Michael (authentication witness)*
7. Garfinkel, Steven
8. Leonard, Robert
9. Juola, Patrick
10. Hernandez, Samuel
11. Ebert, Jim
12. Lynch, Spencer
13. Rayner, Keith
14. Callejas, Adolfo
15. Kim, Yerim (authentication/summary witness)*
16. Moore, Nancy
17. Meacham, Gregory
18. Elena, Sandra
19. Guerra Bastidas, Alberto

Dated: October 9, 2013

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